

### **REMARKS**

Reconsideration of all grounds of objection and rejection in the Office Action and allowance of the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-21 are pending herein. Claims 1-6, 10 and 16 are independent claims. Claims 1 and 6 are independent claims. Claims 1, 5, 9, 15 and 21 have been amended to overcome the objections thereto and the rejection under 35 U.S.C. §112, second paragraph.

Claims 1, 4, 6-8, 10, 13-14, 16 and 19 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Constant Six *et al.* (U.S. Pub. 2003/0219015) ("Constant Six"). Claims 2, 5, 9, 11, 15, 17 and 21 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious over Constant Six in view of Kim *et al.* (U.S. Pub. 2004/0017823) ("Kim"). Claims 3, 12 and 18 stand rejected under 35 U.S.C. §103(a) as allegedly being obvious over Constant Six in view of Yoon *et al.* (U.S. Pub. 2004/0120326) ("Yoon"). Applicant respectfully traverses these grounds of rejection for the reasons indicated herein below.

Applicant respectfully submits that all of the applied art is overcome because of Applicant's priority and/or being commonly owned and assigned. Applicant respectfully submits herewith a copy of a verified English translation showing that the present claims are fully supported by Korean Priority Document 2003-23754 having a filing date of April 15, 2003, which is earlier than the U.S. filing dates of Constant Six (as well as Yoon). Constant Six was filed on May 16, 2003, and Yoon was filed on May 30, 2003,

and based on dates alone, Applicant's priority document overcomes both of these references.

With regard to the verified English translation, Applicant respectfully submits that a side by side comparison of the present application with Korean Priority Document 2003-23754 shows that the drawings are virtually identical, and the specification at page 9, lines 10-15 and 18-24 clearly supports the independent claims, as does the rest of the translation including the claims.

In accordance with MPEP 2136.5 and 35 U.S.C. §119, Applicant's perfection of priority under 35 U.S.C. §119 removes both Constant Six and Yoon as references against the claims of the present application.

In addition, in accordance with 35 U.S.C. §103(c) and MPEP 2146, Kim is commonly owned and assigned to the Applicant and is not an effective reference against the present claims. 35 U.S.C. §103(c) states in part:

(1) Subject matter developed by another person, which qualifies as prior art only under one or more of subsections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the claimed invention was made, owned by the same person or subject to an obligation of assignment to the same person.

Accordingly, as Kim, based on dates alone, which at best might possibly qualify as prior art under 35 U.S.C. §102(e), the reference cannot preclude patentability under 35 U.S.C. §103 because of common ownership and assignment. Further, the rejection under 35 U.S.C. §103(a) also includes Constant Six in combination with Kim. Constant Six is also ineffective as a reference against the present claims based on priority for the reasons

indicated herein above. Thus, the combination cannot be used to reject any claims of the present invention.

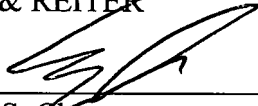
Therefore, as Applicant has removed all of the applied art under either priority and/or 35 U.S.C. §103(c), and all rejections under 35 U.S.C. §112 and the claim objections have been overcome in view of the above amendments to the claims, reconsideration and withdrawal of all grounds of objection and rejection are respectfully requested. In addition, a Notice of Allowance is respectfully requested.

In the event that any additional fee is required to continue the prosecution of this Application as requested, please charge such fee to Deposit Account No. 502-470.

If the Examiner has any questions regarding this Application, it is respectfully requested that the Applicant's attorney of record be contacted at the below-noted telephone number.

Respectfully submitted,

CHA & REITER

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Date: 9-21-07

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